

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

YURI COUTO,
an individual,

-against-

JPMORGAN CHASE & CO., a Delaware
corporation.
Serve on Registered Agent:
THE CORPORATION TRUST COMPANY
CORPORATION TRUST CENTER 1209 ORANGE ST
WILMINGTON, DE 19801
(302) 658-7581

_____CV_____
(Include case number if one has been
assigned)

COMPLAINT

Do you want a jury trial?

★ Yes ☐ No

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

Rev. 1/9/17

I. BASIS FOR JURISDICTION

Under 28 U.S.C. § 1332, a diversity case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000.

What is the basis for federal-court jurisdiction in your case?

★ Diversity of Citizenship

1. Citizenship of the parties

The plaintiff, YURI COUTO, is a citizen of the State of

(Plaintiff's name)

Florida

(State in which the person resides and intends to remain.)

The defendant, JPMORGAN CHASE & CO., is incorporated under the laws of
The State of Delaware

And has its principal place of business in the State of New York

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

YURI J COUTO

First Name

Middle Initial

Last Name

9302 N 28TH ST

Street Address

Hillsborough, Tampa

Florida

33612

County, City

State

Zip Code

813-846-2395

yuric96@yahoo.ca

Telephone Number

Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

Name: JPMORGAN CHASE & CO.

Registered Agent: THE CORPORATION TRUST COMPANY

Address for Service of Process:

CORPORATION TRUST CENTER 1209 ORANGE ST

New Castle County, Wilmington, Delaware 19801

III. STATEMENT OF CLAIM

Place(s) of occurrence: 383 Madison Ave, New York, NY 10179-00015

Date(s) of occurrence: 10/13/23

FACTS:

1. September 27th, 2023, Defendant submitted a digital home purchase loan application through Defendant's website, with a reference number #7772700. October 5th, 2023, Defendant received delivery from Plaintiff of a contract novation offer entitled "HOME PURCHASE LOAN APPLICATION NOVATION" (the "Offer"). Delivery was made by USPS registered mail, tracking number RF738010409US, with a USPS Return Receipt tracking number 9590 9402 8417 3156

7993 54. Offer was delivered to Defendant headquarters at address 383 Madison Ave, New York, NY 10179, attention of Jeremy Barnum, Chief Financial Officer.

2. The Offer included specific terms required for acceptance by the Defendant, particularly, that acceptance of the Offer by the Defendant was to be completed by retention of the original Offer document for five business days after its delivery.
3. On October 13th, 2023, the retention period required for acceptance of the Offer was completed, rendering the Offer accepted as a contract binding to both parties.
4. The Offer stipulates that Plaintiff promises to pay Defendant a total amount of \$505,460,999,439.00 (five hundred five billion four hundred sixty million nine hundred ninety-nine thousand four hundred thirty-nine and 00/100 dollars (the "Total Amount")) in consideration for the Total Amount of loan funds delivered by the Defendant to the Plaintiff's Chase Bank Checkings account within five business days of the Offer's delivery.
5. The Offer was mailed together with a Letter of Credit Claim, which included instructions to the CFO of JPMORGAN CHASE & CO., stating that I had claimed the entire estate of the Principal, on behalf of the Principal, and that the Defendant was to utilize the Principal's invested balance to set-off the loan account.
6. Plaintiff subsequently mailed two additional correspondences requesting Defendant perform as per the contract. The second mailing ("Opportunity to Cure") was delivered to Defendant 10/16/23 by USPS registered mail RF738010443US, return receipt 9590 9402 8510 3186 7399 13. The third mailing ("Notice of Default") was delivered to Defendant 10/19/23 by USPS registered mail RF738010488US, return receipt 9590 9402 8510 3186 7376 98.
7. As of the date of this federal complaint (submitted October 21st, 2023), Plaintiff has not received the original Offer returned by verifiable mail, nor the Total Amount of loan funds into Plaintiff's Chase Bank Checkings account.

Pursuant to these facts, Plaintiff claims that Defendant is in breach of contract.

IV. RELIEF

Plaintiff seeks court injunction requiring Defendant to perform as required on the contract (the Offer) precisely as stated in the terms therein, namely, the delivery of the Total Amount of loan funds into Plaintiff's Chase Checkings account XXXXX8303.

If for any reason Defendant's performance of the contract is not possible, Plaintiff seeks monetary recuperation of the Total Amount (\$505,460,999,439.00).

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported

by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

10/21/2023		/s/ Couto, Yuri-Jacintho: Agent	
<hr/>		<hr/>	
Dated		Plaintiff's Signature	
YURI	J	COUTO	
<hr/>			
First Name	Middle Initial	Last Name	
9302 N 28th St			
<hr/>			
Street Address			
Hillsborough, Tampa	Florida	33612	
<hr/>			
County, City	State	Zip Code	
813-846-2395		yuric96@yahoo.ca	
<hr/>			
Telephone Number		Email Address (if available)	

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

★ Yes ☐ No



**United States District Court
Southern District of New York**

Pro Se (Nonprisoner) Consent to Receive Documents Electronically

Parties who are not represented by an attorney and are not currently incarcerated may choose to receive documents in their cases electronically (by e-mail) instead of by regular mail. Receiving documents by regular mail is still an option, but if you would rather receive them only electronically, you must do the following:

1. Sign up for a PACER login and password by contacting PACER¹ at www.pacer.uscourts.gov or 1-800-676-6856;
2. Complete and sign this form.

If you consent to receive documents electronically, you will receive a Notice of Electronic Filing by e-mail each time a document is filed in your case. After receiving the notice, you are permitted one “free look” at the document by clicking on the hyperlinked document number in the e-mail.² Once you click the hyperlink and access the document, you may not be able to access the document for free again. After 15 days, the hyperlink will no longer provide free access. Any time that the hyperlink is accessed after the first “free look” or the 15 days, you will be asked for a PACER login and may be charged to view the document. For this reason, *you should print or save the document during the “free look” to avoid future charges.*

IMPORTANT NOTICE

Under Rule 5 of the Federal Rules of Civil Procedure, Local Civil Rule 5.2, and the Court’s Electronic Case Filing Rules & Instructions, documents may be served by electronic means. If you register for electronic service:

1. You will no longer receive documents in the mail;
2. If you do not view and download your documents during your “free look” and within 15 days of when the court sends the e-mail notice, you will be charged for looking at the documents;
3. This service does *not* allow you to electronically file your documents;
4. It will be your duty to regularly review the docket sheet of the case.³⁴⁵

CONSENT TO ELECTRONIC SERVICE

I hereby consent to receive electronic service of notices and documents in my case(s) listed below. I affirm that:

1. I have regular access to my e-mail account and to the internet and will check regularly for Notices of Electronic Filing;
2. I have established a PACER account;
3. I understand that electronic service is service under Rule 5 of the Federal Rules of Civil Procedure and Rule 5.2 of the Local Civil Rules, and that I will no longer receive paper copies of case filings, including motions, decisions, orders, and other documents;
4. I will promptly notify the Court if there is any change in my personal data, such as name, address, or e-mail address, or if I wish to cancel this consent to electronic service;
5. I understand that I must regularly review the docket sheet of my case so that I do not miss a filing; and
6. I understand that this consent applies only to the cases listed below and that if I file additional cases in which I would like to receive electronic service of notices of documents, I must file consent forms for those cases.

Civil case(s) filed in the Southern District of New York:

Note: This consent will apply to all cases that you have filed in this court, so please list all of your pending and terminated cases. For each case, include the case name and docket number (for example, John Doe v. New City, 10-CV-01234).

Case of YURI COUTO v. JPMORGAN CHASE & CO.

(Case Number Pending)

COUTO, YURI, J

Name (Last, First, MI)

9302 N 28th St, Tampa,
Florida 33612

813-846-2395

Yuric96@yahoo.ca

Address

10/21/2023

Date

/s/ Couto, Yuri-Jacintho: Agent

Signature

Return completed form to:

Pro Se Intake Unit (Room 200)
500 Pearl Street
New York, NY 10007